

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,) Court File No. 4:80-cv-469 (PAM/KMM)
Plaintiff,)
and)
State of Minnesota, by its Attorney General)
Hubert H. Humphrey, III, its Department of)
Health, and its Pollution Control Agency,)
Plaintiff- Intervenor,)
v.)
Reilly Tar & Chemical Corporation; Housing)
and Redevelopment Authority of St. Louis)
Park; Oak Park Village Associates; Rustic)
Oaks Condominium Inc.; and Phillip's)
Investment Co.,)
Defendants,)
and)
City of St. Louis Park,)
Plaintiff-Intervenor)
v.)
Reilly Tar & Chemical Corporation,)
Defendant,)
and)
City of Hopkins,)
Plaintiff-Intervenor,

CERCLA SECTION 113(i)
INTERVENORS DAIKIN APPLIED
AMERICAS INC. AND SUPER
RADIATOR COILS LP'S JOINT
MOTION TO INTERVENE FOR THE
LIMITED PURPOSE OF OPPOSING
ENTRY OF THE AMENDED CONSENT
DECREE

CERCLA SECTION 113(i)

**INTERVENORS DAIKIN APPLIED
AMERICAS INC. AND SUPER
RADIATOR COILS LP'S JOINT
MOTION TO INTERVENE FOR THE
LIMITED PURPOSE OF OPPOSING
ENTRY OF THE AMENDED CONSENT
DECREE**

v.)
Reilly Tar & Chemical Corporation,)
Defendant,)
and)
Daikin Applied Americas, Inc. and)
Super Radiator Coils LP,)
Prospective-Limited)
Intervenors.)

Limited Intervenors Daikin Applied Americas, Inc. and Super Radiator Coils LP, by and through their respective undersigned counsel, hereby move the Court pursuant to Section 113(i) (42 U.S.C. § 9613(i)) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §§ 9601-9675 (“CERCLA”) and Rule 24 of the Federal Rules of Civil Procedure, for an Order allowing them to intervene in this matter for the limited purpose of opposing entry of the Amended Consent Decree [Doc. No. 37]. This Motion is based upon Daikin Applied Americas, Inc. and Super Radiator Coils LP’s Joint Memorandum of Law, Declaration of Melinda W. Hahn, PHD, Declaration of Aaron L. Benker, and all the files, records and proceedings herein, and such evidence and argument as may be presented to the Court prior to the decision on this Motion.

Respectfully submitted,

Dated: June 2, 2020

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INTERVENOR DAIKIN APPLIED
AMERICAS, INC.**

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